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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA (Las Vegas)**

DEBRA D. MCGEE,

Plaintiff,

v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

Case No. 15-cv-01081-RCJ-GWF

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her cross-motion to affirm, due on November 2, 2015, by 30 days, through and including December 2, 2015.

An extension of time is needed in order to prepare Defendant's motion because Defendant's counsel has an unusually heavy workload including active EEOC litigation. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,  
2 on December 2, 2105.

3 Respectfully submitted on November 2, 2015.

4 DANIEL G. BOGDEN  
5 United States Attorney

6 By: /s/ Armand Roth  
7 ARMAND ROTH  
Special Assistant United States Attorney

8 OF COUNSEL:

9 DEBORAH LEE STACHEL  
10 Acting Regional Chief Counsel, Region IX

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12  
13 IT IS SO ORDERED:

14  
15 DATED: November 3, 2015

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18 HON. GEORGE FOLEY, JR.  
19 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I, Armand Roth, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

**CM/ECF:**

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Dated: November 2, 2015.

DANIEL G. BOGDEN  
United States Attorney

By: /s/ Armand Roth  
ARMAND ROTH  
Special Assistant United States Attorney